

To: The Commission

Re: 04-232, a proposal to require recordings of radio station broadcasts.

KWWC-FM, Columbia, MO, owned and operated by Stephens College, is on record opposing radio station recordings of broadcasts for two reasons.

First, our campus station, an instructional lab for new broadcasters, takes great pride in training new broadcasters to avoid indecent broadcasts. Each student must undergo multi-week training sessions that focus on the FCC's Checklist for FM Broadcast Stations before they conduct their first air shows. Students are required to read the material, discuss it with qualified instructors, and pass a test that covers: the importance of EAS tests, maintenance of the public file, and indecency, among other issues. A probation system, known to all announcers, focuses specifically on indecent broadcasts and the penalties for broadcasting such material. In short, we take great steps to avoid ALL indecent material on our airwaves with a system that has proven its worth to the station and the community.

Second, the cost and maintenance of a recording system would tax our already strained budget. As a non-commercial station, we operate with limited funds from the college and small amounts of underwriting. Limited staffing suggests that attention to a recording system would surely impact our efforts to serve the community with unique entertainment options, news, and public affairs programming.

Please do not penalize small, non-commercial broadcasters based on the actions of a few and, in some cases, gross offenders of indecency regulations.

Mark Smith, General Manager, KWWC-FM